

**UNITED STATES DISTRICT COURT**  
 for the  
 District of New Mexico

United States of America )  
 v. )  
 Raimundo Gomez ) Case No. 24-944 MJ  
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*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 3, 2024 in the county of Dona Ana in the  
 State and District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1324 (a)(1)(A)(v)(I)	Conspiracy to Transport Illegal Aliens

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



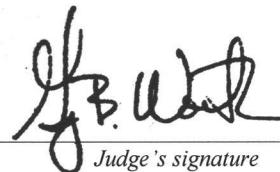
*Complainant's signature*

Michael P. Beers, Special Agent

*Printed name and title*

*by telephone*  
 Sworn to before me and signed in my presence.

Date: 07/05/2024



*Judge's signature*

City and state: Las Cruces, New Mexico

Gregory B. Wormuth, U.S. Magistrate Judge

*Printed name and title*

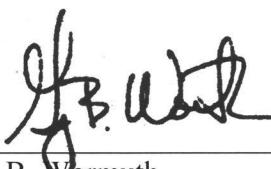
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

VS

Raimundo GOMEZ

On July 2<sup>nd</sup>, 2024, United States Border Patrol agents (BPA) from Las Cruces, New Mexico were conducting traffic check operations at the immigration checkpoint located at Interstate 10, mile marker 120 west of Las Cruces. At approximately 11:20 pm, a red Freightliner tractor with flatbed trailer Florida license plates approached the primary inspection and was stopped by BPAs. The primary BPA approached the driver and identified himself as a BPA and began his immigration inspection. The BPA questioned the driver, later identified as Raimundo GOMEZ, as to his citizenship. GOMEZ provided a Permanent Resident card and his Florida driver's license. The BPA asked GOMEZ if any additional passengers were in the passenger compartment of the vehicle. GOMEZ did not answer. A Supervisory BPA (SBPA) shined a flashlight through the window into the sleeper compartment of the tractor. The SBPA reported to the primary BPA that he could see additional passengers attempting to avoid detection in the sleeper compartment. GOMEZ was instructed to turn off the ignition of the vehicle. The BPA instructed GOMEZ to exit the vehicle. The BPA entered the vehicle and encountered 15 additional passengers riding unrestrained on the top and bottom bunks of the sleeper compartment of the vehicle. All 15 passengers were questioned as to their immigration status and citizenship. All 15 passengers admitted being in the United States illegally without valid immigration documentation. All passengers were detained and transported to Las Cruces Border Patrol station for processing. GOMEZ was detained and transported to the Las Cruces Border Patrol station for further questioning.

Homeland Security Investigations (HSI) Special Agents (SAs) conducted a post-Miranda interview of GOMEZ. GOMEZ stated he had been working for the past month transporting illegal aliens from El Paso, Texas to Deming, New Mexico. GOMEZ stated that during that month, he had transported five additional groups of approximately seven to eight illegal aliens per group. GOMEZ stated that this group of 15 was the largest group he has transported. GOMEZ stated that he was aware that the individuals that he was picking up were illegal aliens that did not have valid documentation to be or reside in the United States legally. GOMEZ stated that he agreed to transport the illegal aliens to Deming, NM for \$800 per alien. GOMEZ stated that he expected to be paid for the 15 illegal aliens upon delivery of the aliens to Deming, or the next time that GOMEZ drove through El Paso, TX.



Gregory B. Wormuth  
United States Magistrate Judge  
District of New Mexico



Michael P. Beers  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me on July 5<sup>th</sup>, 2024.